

FORM TO BE USED BY A PRISONER IN
FILING A CIVIL RIGHTS COMPLAINT

2019 APR -1 PM 2:37

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF OHIO

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

Andre Jenkins

(Enter above the full name of the plaintiff in this action)

CIVIL CASE NO. 1:19 CV 715

JUDGE _____

COMPLAINT
JUDGE PEARSON
MAG. JUDGE BURKE

vs. Armond Budish - Cuyahoga Exec.

Clifford Pinkney - Sheriff

Kenneth Mills - Director

Eric Ivey - Warden

Jane Platten - Metro Health Chief

(Enter above the full name of the defendant(s) in this action)

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ☐ NO ☒

B. If your answer to A is yes, describe the lawsuit in the space below, (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county)

3. Docket Number _____

4. Name of judge to whom case was assigned _____

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III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any).

A. Name of the Plaintiff Andre Jenkins

Address Cuyahoga County Jail, P.O. Box 5600 Cleveland Ohio 44104

(In item B below, place the full name of the defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Use item C for the names, positions and places of employment of any additional defendants).

B. Defendant Armond Budish - Cuyahoga County Exec. is employed as
1219 Ontario St. at Cleveland Ohio 44113

C. Additional Defendants Clifford Pinkney Sheriff, Kenneth Mills Director,
Eric Ivery Warden, Jane Platten Metro Health Chief of Staff

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separated paragraph. Use as much space as you need. (Attach extra sheet(s) if necessary).

ON or about 11-30-2018, while awaiting Trial in the
Cuyahoga County Jail I was being Denied my Mental
Health Medication. I Requested to speak to a Mental
Health Expert to No Avail. The C.O. Repetively Kept
Denying my Request for Help. The lack of my Mental
Health Medication I started to Act out in Fear due to
Anxiety, and my P.T.S.D... I covered up my Window
in hopes to alert the proper personnel with Toilet paper,

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(Statement of Claim Continued)

The C.O. opened my door and violently pushed me Back and pulled Down the Toilet Paper. I ended up with a Cut ON my Finger as a result of the C.O pushing violently backwards. I was finally escorted by Corporal Hawiken to medical and Treated for my hand Injury.

I told the Mental health person I felt Suicidal but was Denied Treatment. I was then sent Back to Seg. and alerted SRT Hines that I still felt Suicidal. I had to Cover up my window with Toilet Paper to receive treatment. I was sent to the 7th Floor and put on observation. I was on Suicide watch from 12-5, to 12-8, 2018 and received No Counseling.

I was Returned back to Seg. 10A due to the Fact the C.O. claimed I assaulted him as a result of Refusing me Mental health Treatment. I received a Injury as a result of the C.O. opening my Cell Door without a Supervisor present and used violent force against me.

I was placed ON Security Seg. because I was requesting Mental Health Services. I was assaulted by a SRT officer and received a hand injury as a result.

C.O. Issued me a Conduct Report for Assault due to the Fact the Jail Failed to conduct a use of Force Hearing.

I was held under A.D.P.I passed the 24 hour Required to Hear a Conduct Report. Again a use of Force Hearing was

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(Statement of Claim Continued)

Not Conducted due to the fact of the U.S. Marshals that the Jail is operating under INHUMANE CONDITIONS which is affecting my Mental Health.

I was then Taken to 10-H Cell 6, which is covered in Black Mold. The rain water continuously Runs into my Cell from the Roof when it Rains.

I contacted the health Department Regarding the issue of Black Mold. I have to Keep wiping it up by hand. I've Been feeling sick Due to the Black mold and the water I Drink here.

The Food Trays are Infested with stagnant water. Breakfast is only Consisting of two of the Major Food groups Calorie Intake at best is 1200 to 1400 per day.

Ventelation is Not operating properly. It stinks of Feces and urine.

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V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes).

Correct the Problem with Mental Health

Services and Medical. Award Plaintiff 12,500,000.00

Grant Jury Demand.

Signed this 28th day of March, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

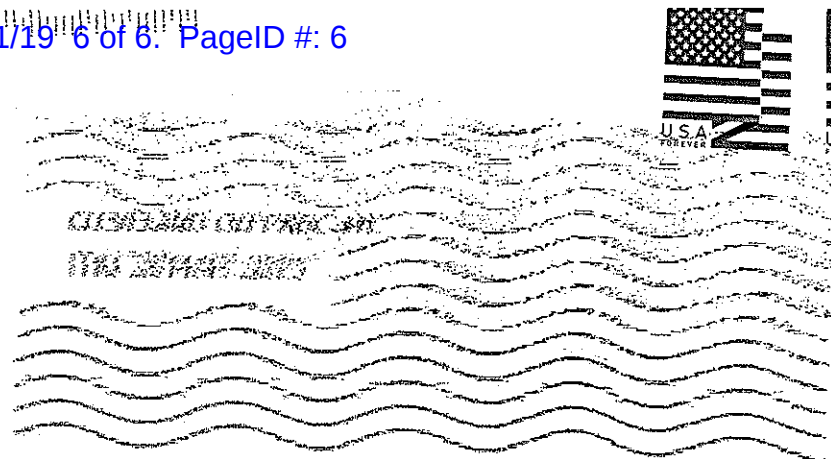
3-28-19

(Date)

Andre Jenkins

(Signature of Plaintiff)

Andre Jenkins SO# 0227570
Cuyahoga County Jail 1-10-H
P.O. Box 5600
Cleveland, Ohio 44101



Office of the Clerk
United States District Court, Northern District of
Carl B. Stokes United States Courthouse
801 West Superior Ave
Cleveland, Ohio 44113-1830